UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

DEFENDANT GHASSAN BALLUT'S CO-COUNSEL'S MOTION FOR LEAVE TO BRING ELECTRONIC DEVICES TO COURTROOM

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, pursuant to Local Rule 4.11(b), hereby requests this Honorable Court to permit the Defendant's co-counsel to bring into the Court an electronic device as described below during the trial of this cause and other related proceedings, and as grounds therefor states:

- 1. A substantial portion of the evidence provided by the parties in this cause was placed on CD-ROM disks to facilitate storage and retrieval of hundreds of pages of information.
- 2. All of the Defendant's motions and most of the Defendant's counsel's work product in this case has also been stored electronically, either to hard drive, CD-ROM's, or floppy disks over a period of more than two years.
- 3. The electronic device the Defendant's co-counsel asks to bring into Court is the co-counsel's Compaq Presario V4000 laptop computer, including a power cord.
- 6. This electronic device will be brought into the courthouse with the understanding that the device will be subject to inspection at any time by court security personnel.

Memorandum of Law

The judicial officer before whom a a particular case or proceeding is pending may permit

cellular telephones and computer equipment to be brought into the courthouse and courtroom.

Local Rule 4.11(b). Such permission has already been given to other counsel in this case to facilitate access to records and materials during the trial of this cause.

Respectfully submitted,

/s Brooke V. Elvington
Brooke V. Elvington
Florida Bar No. 526967
Piper, Ludin, Howie & Werner, P.A. 5720 Central Avenue
St. Petersburg, FL 33707
Telephone (727) 344-1111
Facsimile (727) 344-1117

Certificate of Service

I HEREBY CERTIFY that on June 5, 2005, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Terry A. Zitek, Esq.
Office of the United States Attorney
400 North Tampa Street, Suite 3200
Tampa, FL 33602

William B. Moffitt, Esq. Cozen O'Connor, P.C. 1667 K Street, N.W., Suite 500 Washington, DC 20006-1605

Cherie L. Krigsman, Esq.
Office of the United States Attorney
601 D Street N.W., Suite 6500
Washington, DC 20530

M. Allison Guagliardo, Esq. Office of the Federal Public Defender 400 North Tampa Street, Suite 2700 Tampa, FL 33602

Stephen N. Bernstein, Esq. P.O. Box 1642 Gainesville, FL 32602-1642

Linda G. Moreno, Esq. 1718 East 7th Avenue Suite 201 Tampa, FL 33605

/s Brooke V. Elvington
Brooke V. Elvington
Florida Bar No. 526967
Piper, Ludin, Howie & Werner, P.A.
5720 Central Avenue
St. Petersburg, FL 33707
Telephone (727) 344-1111
Facsimile (727) 344-1117